

1 ROWLAND MARCUS ANDRADE
2 9414 Plaza Point Drive
3 Missouri City, Texas 77459 USA

4 In Pro Se

5 UNITED STATES DISTRICT COURT

6 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

7
8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 ONE PARCEL OF REAL PROPERTY
12 LOCATED AT 9414 PLAZA POINT DRIVE,
13 MISSOURI CITY, TEXAS 77459,

14 Defendant.

15 ROWLAND MARCUS ANDRADE,

16 Claimant.

17 SOLMAZ ANDRADE,

18 Claimant.

19
20 WILMINGTON SAVINGS FUND SOCIETY,
21 FSB as trustee for IRP FUND II TRUST 2A,

22 Claimant.

Case No. 3:20-cv-2013-VC

**DECLARATION OF ROWLAND
MARCUS ANDRADE IN OPPOSITION
TO THE UNITED STATES' MOTION TO
FILE UNDER SEAL**

Trial Date: None Set

1 I, Rowland Marcus Andrade, declare as follows:

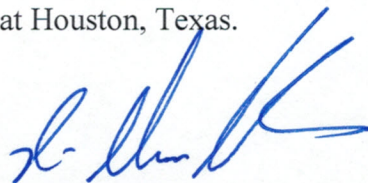
2 1. I am a Claimant in this case and the owner, jointly with my wife Solmaz Andrade,
3 of the Defendant Parcel of Real Property Located at 9414 Plaza Point Drive, Missouri City, Texas
4 77459. I am personally familiar with the facts stated below and, if called as a witness, could testify
5 competently thereto.

6 2. On September 13, 2018, the United States District Court for the District of Nevada
7 issued a search and seizure warrant to search the Las Vegas, Nevada office of my company, the
8 NAC Foundation, and seize essentially all of my business's electronic and hard copy files, binders,
9 and bank receipts. A true and correct copy of that search and seizure warrant is attached hereto as
10 Exhibit 1.

11 3. The United States has also issued a warrant to seize all funds in several bank
12 accounts held in my name or the names of businesses in which I have an interest, including
13 accounts in the name of NAC Payroll Services, Inc., the Fintech Fund Family Limited Partnership,
14 and the ABTC Corporation. The amount of funds to be seized pursuant to this warrant total about
15 \$6.7 million. A government agent served this page on me purporting to be the attachment to a
16 search warrant, without providing a copy of the underlying search warrant. A true and correct
17 copy of the purported attachment to the seizure warrant listing those bank accounts is attached
18 hereto as Exhibit 2.

19
20 I declare under penalty of perjury that the foregoing is true and correct.

21
22 Executed on this 1st day of June, 2020, at Houston, Texas.

23
24 

25 _____
26 Rowland Marcus Andrade